

EXHIBIT A



Paula Knudsen Burke <pknudsen@rcfp.org>

Re: Gregory V. Manco v. SJU et al. - Devin Yingling's Deposition

1 message

Paula Knudsen Burke <pknudsen@rcfp.org>

Tue, May 20, 2025 at 4:27 PM

To: "William A. Hartner" <wahartner@zarwin.com>

Cc: "Joseph M. Toddy" <jmtoddy@zarwin.com>, "Marina A. Abirached" <MRached@zarwin.com>

Good afternoon -

I will not accept service on Ms. Yingling's behalf.

Any subpoena at this juncture would be improper because discovery closed on May 14, 2025 (ECF No. 175) and your subpoena was already quashed (ECF No. 188). Further attempts to harass my client with frivolous subpoenas may force us to consider seeking appropriate sanctions under Rule 11.

Sincerely,

Paula Knudsen Burke



Paula Knudsen Burke
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On Tue, May 20, 2025 at 2:06 PM William A. Hartner <wahartner@zarwin.com> wrote:

Counsel,

Since you are counsel of record for witness Devin Yingling are you amenable to accepting service of the subpoena for deposition on behalf of your client in connection with the above matter. Kindly advise as to your position as soon as possible so we may move forward.

Thank you,

William A. Hartner



William A. Hartner, Esq.

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